

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Chapter13
Frederick C. James

(DEBTOR) Bankruptcy No. 18-13675-mdc13

**NOTICE OF MOTION TO AVOID JUDICIAL LIEN OF MIDLAND FUNDING, LLC
RESPONSE DEADLINE AND HEARING DATE**

Debtor's Counsel has filed A Motion to Avoid Judicial Lien of Midland Funding, LLC in this bankruptcy case.

Your rights may be affected. You should read the papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **September 26, 2018**, you or your lawyer must do **all** of the following:
 - A) file an Answer explaining your position at The United States Bankruptcy Court, Robert N. C. Nix Bldg., 900 Market Street, Philadelphia, PA 19106,
 - b. Mail a copy to: Michael A. Cataldo, Esquire, Cibik & Cataldo Law Offices, 1500 Walnut Street, Suite 900, Philadelphia, PA 19102, Telephone No. (215) 735-1060, Fax No. (215) 735-6769 and serve all other interested parties.
2. If you or your attorney do not take the steps described in paragraph 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.
3. A hearing is scheduled to be held before the Hon. Magdeline D. Coleman, on **October 9, 2018** at **10:30am** in **Courtroom No. 2**, United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, 2nd Floor, Philadelphia, PA 19107.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Date: **September 12, 2018**